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8	BEFORE THE BOARD OF REGISTERED NURSING
9	DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA
10	
11	In the Matter of the Accusation Against: Case No. 2011-512
12	CHRISTINE LEE BOUSQUETTE ACCUSATION
13	285 Ridgeway Circle Ellijay, GA 30540
14	Registered Nurse License No. 649986
15	Respondent.
	icospondent.
16	Complainant alleges:
17	PARTIES
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20	official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
21	Department of Consumer Affairs.
22	Registered Nurse License
23	2. On or about December 22, 2004, the Board issued Registered Nurse License Number
24	649986 to Christine Lee Bousquette ("Respondent"). The registered nurse license was in full
25	force and effect at all times relevant to the charges brought herein and will expire on November
26	30, 2012, unless renewed.
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ACCUSATION

STATUTORY PROVISIONS

- 3. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with Code section 2750) of the Nursing Practice Act.
- 4. Code section 118 provides, in pertinent part, that the withdrawal of an application for a license after it has been filed with a board . . . shall not deprive the board of its authority to institute or continue a proceeding against the applicant for the denial of the license upon any ground provided by law or to enter an order denying the license upon any ground.
- 5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under Code section 2811, subdivision (b), the Board may renew an expired license at any time within eight years after the expiration.
 - 6. Code section 2761 states, in pertinent part:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action....

COST RECOVERY

7. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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FIRST CAUSE FOR DISCIPLINE

(Disciplinary Action by the Arizona State Board of Nursing)

- 8. Respondent is subject to discipline pursuant to Code section 2761, subdivision (a)(4), on the grounds of unprofessional conduct, in that she was disciplined by the Arizona State Board of Nursing ("Arizona Board"), as follows:
- 9. On or about August 9, 2006, pursuant to a Consent Agreement, in the disciplinary action entitled: In the Matter of Professional Nurse License No: RN131168 issued to: Christine Lee Bousquette, the Arizona Board issued a Decree of Censure on Respondent's nursing license.
 - 10. The Arizona Board based its Order on the following facts:
 - a. On or about 2005, Respondent was employed as a Registered Nurse at Professional Respiratory Care Services in Phoenix, Arizona.
 - b. On or about October 31, 2005, Respondent was on assignment at Maricopa Medical Center in Phoenix, Arizona and assigned to Patient RA. Patient RA's family had decided to withdraw all life support, the patient had been extubated and all intravenous solutions had been removed. The only intravenous that was infusing was morphine as ordered. Patient RA did not have a pulse and the tracing on the monitor reflected a flat line. Respondent contacted the physician so he could come to the unit to pronounce the patient deceased.
 - c. Respondent, while in the process of printing a hard copy of a rhythm strip from the monitor for the medical record, noted the patient had a heart rate. Respondent was stunned and asked the advice of the charge nurse on duty. The charge nurse instructed Respondent to restart the Propofol that had been discontinued earlier. The charge nurse left the room but returned with a syringe and injected "something" into the intravenous line.
 - d. Respondent asked the charge nurse what he had given Patient RA. The charge nurse responded he had given Patient RA a dose of Norcuron and that it would help the patient. Respondent was told by the charge nurse to not tell anyone what he had done with the Norcuron.

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1	e. Respondent did not document either the Propofol or the Norcuron in the patient
2	medical record. Respondent did not inform her supervisors regarding any of these events
3	because she was concerned she would be blamed.
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5	SECOND CAUSE FOR DISCIPLINE
6	(Unprofessional Conduct)
7	11. Respondent is subject to discipline under Code section 2761, subdivision (a), on the
8	grounds of unprofessional conduct, in that Respondent committed acts constituting unprofessional
9	conduct, as more particularly set forth in paragraphs 8 through 10, above.
10	<u>PRAYER</u>
11	WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
12	and that following the hearing, the Board of Registered Nursing issue a decision:
13	1. Revoking or suspending Registered Nurse License Number 649986, issued to
14	Christine Lee Bousquette;
15	2. Ordering Christine Lee Bousquette to pay the Board of Registered Nursing the
16	reasonable costs of the investigation and enforcement of this case, pursuant to Business and
17	Professions Code section 125.3; and,
18	3. Taking such other and further action as deemed necessary and proper.
19	A San Day
20	DATED: Scenher 18, 2010 Jourse K. Dailey LOUISE R. BAILEY, M.Ed., RN
21	Executive Officer Board of Registered Nursing
22	Department of Consumer Affairs State of California
23	Complainant LA2010601226
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